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# **Lawrence Livermore National Laboratory's Implementation of the Onsite Transportation Requirements Under the New 10CFR830 Rule CTMA Conference**

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# **LLNL's Current Operating Status**

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**As of April 11, 2001, LLNL is operating under an Interim On-site Transportation Safety evaluation Report developed by NNSA-OAK (IOTSD)**

# Background

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**The establishment of the IOTSD was prompted for the following reasons:**

- **Codification of the three DOE Nuclear Safety Orders into 10CFR830, Subpart B, that was finalized during winter, 2001**
- **Lack of DOE approved documented safety analysis as required by 10CFR830, Subpart B for transportation activities that do not meet 49CFR requirements**
- **Lack of DOE Order 460.1, being part of the LLNL work smart standards, current LLNL transportation and packaging documents were not prepared specifically to these orders requirements**

## Background

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**With the issuance of the Rule LLNL is currently focusing their efforts on assuming compliance of their existing nuclear facility authorization basis to the new Nuclear Safety Rule (10CFR830, Subpart B).**

**The laboratory is evaluating the “Safe Harbor” methods of 10CFR830 and determining whether to amend the existing On-site Transportation manual and submit it to NNSA-OAK for approval, or conform to the 49CFR off-site requirements.**

## **Current Safety Methodology**

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**The laboratory must conform to all of the IOTSD requirements effective April 11, 2001, for on-site transfers of nuclear materials until a 10CFR830 program is fully implemented.**

**The conformance to IOTSD requirements shall be in documented format that can be audited.**

**The Laboratory must determine if the Category 3 threshold quantity in DOE-STD-1027-92, is exceeded for each on-site transfer of radionuclides.**

**The IOSTD has established 15 required actions for the laboratory to adhere to while performing off-site transportation activities.**

## Path Forward

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**Until NNSA-OAK completes their review of the yet to be developed, transportation safety document, TSRs and USQ Procedure, this SER establishes an IOTSD and superceded past direction regarding the LLNL on-site transportation activities.**

# Resource Requirements

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- The LLNL PATS Program Office will coordinate the development of the new manual using existing funding
- Funding sources for activities performed outside of the PATS office, are undefined such as a safety assessment for on-site transportation, subject to the rule, and the development of a USQ process for on-site transportation

## **Schedule and Milestones**

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- **A draft On-site Nuclear Materials Transportation Safety manual will be submitted to NNSA-OAK by July 12, 2002**
- **The final on-site manual will be submitted to NNSA-OAK by January 31, 2003**



# **Assumptions and Key Issues that the Schedule is Based Upon**

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**Assumptions are that the existing DOE orders for Safe Harbor, do not change during the development of the new on-site manual.**

**Other assumptions are that there are no additional contract issues with DOE order 460.1A, which is not currently in the LLNL contract. Compliance with a DOE order that is not in the contract as a Safe Harbor provision is unprecedented, and may lead to enforcement uncertainties.**

**Additionally, DOE order 461.1 is currently under moratorium and review from the NNSA-HQ and has a strong possibility of being modified as part of the NNSA review.**